

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 03-530-A
	)	
SABINA S. FARUQUI, <i>et al.</i>	)	

CONSENT ORDER OF FORFEITURE

WHEREAS, pursuant to a written plea agreement, the defendant, Sabina S. Faruqui, pleaded guilty to a felony violation of Title 21, United States Code, and agreed to forfeit all of her interests in the property that is the subject of this order of forfeiture and to the entry of an order of forfeiture concerning such property;

AND WHEREAS, defendant agrees to waive the provisions of Federal Rules of Criminal Procedure 32.2, and 43(a) with respect to notice in the criminal Indictment that the government will seek forfeiture as part of any sentence in this case, and that entry of this order shall be made a part of the sentence in or out of the presence of the defendant and be included in the judgment in this case without further order of the Court;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED  
THAT:

1. The following property is forfeited to the United States of America pursuant to 21 U.S.C. § 853, as property in which the defendant had an interest, and that facilitated the defendant's offense or a substitute for such property, or as the proceeds of drug trafficking or property derived from, traceable to, fungible with, or a substitute for such property:



## **A. Conveyances**

1. 2001 Mercedes Benz, ML55, VIN: 4JGAB74E91A244010;
2. 2002 Ford Excursion SUV, VIN: 1FMNU42S02EA86167;
3. 2002 Harley Davidson V-rod Motorcycle, VIN: 1HD1HAZ162K802492;
4. 2003 Lincoln Towncar Limousine, VIN: L11FM81W63Y600301;
5. 2002 Mercedes Benz E-55 AMG, VIN: WDBJF74J32B439312;
6. 1966 Ford Mustang, VIN: 6F07C317066;
7. 2002 GMC Yukon Denali, VIN: 1GKFK66UX2J332269;
8. 2002 GMC Yukon Denali, VIN: 1GKFK66U82J333212;
9. 2003 BMW X5, VIN: 5UXFA53593LV80202;
10. 2003 Mercedes Benz S600V, VIN: WDBNG76J23A327121;
11. 2003 Ford E250 Econoline Cargo Truck, VIN: 1FTNS24L43HA02758;
12. 2003 Mercedes Benz ML-55 AMG, VIN: 4JGAB74E53A418514
13. 2003 Mercedes Benz S500V, VIN: WDBNG75J83A342627;
14. 2003 Mercedes Benz E55 AMG, VIN: WDBUF76J03A310848;
15. 2002 Red Yamaha 4-wheel Drive All Terrain Vehicle, VIN: JY4AM02Y92C023546;

## **B. Jewelry**

- (1) 15.88 CTW WS1 Platinum 4-prong diamond tennis bracelet;
- (2) 2.01 CT ME.03 3 Oval ring;
- (3) 11.16 TW VS-1-2 Platinum 3-prong diamond tennis bracelet;
- (4) 10.16 CTW VVS Platinum pear-shaped earrings;
- (5) 30.3 CTW Emerald-cut platinum diamond tennis bracelet, VVS-1-VS-1;
- (6) 1.25 CTW VS F Diamonds set in 18K gold earrings;



- (7) 1.60 CTW VS1 F Diamonds set in 18K white gold earrings;
- (8) Jaeger Lecoultre Duetto watch;
- (9) 6.20 CTW VS F Diamond trillion-cut in platinum necklace;
- (10) 6.20 CTW VS F Diamond trillion-cut in platinum necklace;
- (11) 2.05 CTW BS F-H 18K Diamond baguette and marquis-cut, gold ring;
- (12) 1.33 CTW VS FH Oval radiant-cut diamond ring;
- (13) 2.95 CT Emerald set in a platinum ring;
- (14) 2.32 CTW HS DE VS 1 Clover-shaped diamond heart necklace;
- (15) 3.88 CT WS1D Emerald set in a ring;
- (16) 2.42 CTW HS DF VS1, Clover-shaped diamond heart necklace;
- (17) 4.51 CT Emerald set in a platinum man's ring;
- (18) 5.93 CT WS2 D Diamond set in a ring;
- (19) 1.40 CTW 2 Trillion-cut diamonds;
- (20) 2.06 CTW Baguette, .91 CTW ring;
- (21) 3 CTW VS-SI1 Platinum earrings;
- (22) 15 CTW VS-SI1 F Platinum necklace;
- (23) Round 1.74CT VS2 F Stone for earrings 3.46 CTW;
- (24) Round 1.72CTSI1 F Stone for earrings;
- (25) 3/4 CTW VS-SI F Platinum/18K Remount w/P/S Center;
- (26) Round 2.01ct VS2 F Round in omega;
- (27) .80 CTW VS D-F Plat OHM;
- (28) 1.25 CTW VS F Platinum earrings;
- (29) 8.60 CTW VS F Round & Princess WG necklace;



- (30) 1/5ct I1 F White gold channel pendant;
- (31) 1/5ct SI1 GH White gold fancy pendant;
- (32) Round 1.38ct VS2 F necklace;
- (33) Trilliant 1.58ct SI1 D necklace;
- (34) Trilliant 2.06ct VS2 E necklace;
- (35) Round 2.06ct VS2 F necklace;
- (36) Heart 1.04ct VS2 E ring;
- (37) Pear 1.57ct VS1 F necklace;
- (38) 1.30 CTW VS DE platinum ring;
- (39) 2 CZ White gold tiffany star pins;
- (40) 15.88 CTW VS-SI Def Platinum 4 PRG tennis bracelet;
- (41) 1.25 CTW VS F platinum earrings;
- (42) 2.50 CTW VS D-F platinum earrings;
- (43) 3/4 CTW SI1 FG White gold necklace;
- (44) 3.80 CTW VS1-SI1 FH Platinum necklace;
- (45) ½ CTW VS De 18kt Ohm pendant;
- (46) Fancy Platinum Ohm pendant;
- (47) 1.34 CTW VS1 D-F Platinum cuff links;
- (48) 7 Platinum toe rings;
- (49) 20" Platinum 4mm rolo chain;
- (50) .30tw SI1 FG 14K WG earrings;
- (51) 3 1/4 CTW VS D-E Plat. Pearl drop earrings;
- (52) 1 ½ CTW VS-SI1 F WG necklace;



- (53) Trilliant 2.51ct SI1 E;
- (54) Platinum labor custom ring;
- (55) .60ct DE VS1 Platinum tie tac;
- (56) Frank Mueller watch;
- (57) D .27tw VS DE Rd. Platinum;
- (58) D .58tw VS DF T. Bgt Platinum mounting;
- (59) 1/2tw DF VS Round WG Hoop earrings;
- (60) Marquise 5.11ct IF D;
- (61) 1.95 CTW VS DE BGT RD MQ Mounting for marquise;
- (62) Platinum Gents Presidential Rolex;
- (63) 48.22 Heart tennis bracelet;
- (64) Frank Mueller Watch Stainless TransAmerica;
- (65) Watch Winders;
- (66) 18 CTW VS DE Emerald-cut platinum bracelet;
- (67) 6.24 CTW VS DE Platinum ring eternity band;
- (68) 2.06ct F VS2 Princess-cut pendant;
- (69) 4.08ct SI1 D Heart;
- (70) Platinum custom mounting & chain;
- (71) Platinum chain and heart setting;
- (72) 4.25 ct. Emerald-cut sapphire;

**C. Real Estate Deposit**

\$20,000 real estate deposit with Wimbish-Riteway Realtors, Inc., for property located at 521 Ocean Blvd., Golden Beach, Florida;



**D. Piano**

Baby Grand Yamaha Disklavier piano, serial # 5906545;

**E. Bank Accounts**

All funds in the following bank accounts:

<i><b>Institution</b></i>	<i><b>Account Name</b></i>	<i><b>Account Number</b></i>
SunTrust Bank, Ft. Lauderdale, Florida	Anjali & Sushma Chhabra	678003072106
SunTrust Bank, Ft. Lauderdale, Florida	Naresh & Sushma Chhabra	436000012742
SunTrust Bank, Ft. Lauderdale, Florida	USA Prescription Inc. Affiliate Account and any reserve account	436000702676
SunTrust Bank, Ft. Lauderdale, Florida	Vincent K. Chhabra, or Sabina S. Faruqui	436000013773
SunTrust Bank, Ft. Lauderdale, Florida	Vincent K. Chhabra, Sabina Faruqui, or Gwendolyn Camille Pendland (Home Operating Account)	436000013781
SunTrust Bank, Ft. Lauderdale, Florida	Chhabra Family	436000702773
SunTrust Bank, Ft. Lauderdale, Florida	1-800-Inkjets and any reserve account	436000703770
AXA Financial Inc./Equitable	Sabina S. Faruqui	63L-027511
AXA Financial Inc./Equitable	Vincent Chhabra	63L-028816
AXA Financial Inc./Equitable	Naresh C. Chhabra	63L-027503
Fifth Third Bank	ePrescribe, Inc. and any reserve account	543684202540004
Fifth Third Bank	MedPrescribe, Inc. and any reserve account	543684202540002
Fifth Third Bank	SafeWeb Medical, Inc. and any reserve account	543684202540003
Fifth Third Bank	USA Prescription, Inc. and any reserve account	543682402540001
Fifth Third Bank	USA Prescription, Inc. and any reserve account	206420
Union Planters Bank	USA Prescription, Inc.	9660345092



<b><i>Institution</i></b>	<b><i>Account Name</i></b>	<b><i>Account Number</i></b>
Wachovia Bank	USA Prescription	2000015472809
SunTrust Bank	Najmus & Sabina Faruqui	1000007920738
SunTrust Bank	Najmus & Sabina Faruqui	678003069818
SunTrust Bank	Vincent Chhabra & Sabina Faruqui	436000013765
Metropolitan Life Insurance	Naresh C. Chhabra	997107197UM
Metropolitan Life Insurance	Naresh C. Chhabra	967305795UM
Metropolitan Life Insurance	Vineet K. Chhabra	958406246UM
Metropolitan Life Insurance	Vineet K. Chhabra	977508601UM
Solomon Smith Barney	Vincent Chhabra/VKC Consulting, LLC	229-04882-15 390
Solomon Smith Barney	Vincent K. Chhabra/VKC Consulting, LLC	229-03771-14 390
Solomon Smith Barney	Vincent K. Chhabra/VKC Consulting, LLC	752A236
American Express Merchant Account	USA Prescription Inc., dba USA Prescription.com	373962410541007
State Bank of India	Naresh Chhabra	0139J02555208
State Bank of India	Naresh Chhabra	0139502555205
India Overseas Bank	Naresh Chhabra	928214
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547256
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547257
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547258
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547260
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547262
Hong Kong and Shanghai Banking Corporation, India	Naresh Chhabra	051706547260
Leadenhall Trust, Bahamas	Vincent K. Chhabra	59200



<b><i>Institution</i></b>	<b><i>Account Name</i></b>	<b><i>Account Number</i></b>
Leadenhall Trust, Bahamas	Vincent K. Chhabra	59200
Union Bank of India	Naresh C. Chhabra	D911373491121
Union Bank of India	Naresh C. Chhabra	30702041124
Allied Irish Banks PLC	Chhabra International, Ltd.	03313057
Allied Irish Banks PLC	Chhabra International, Ltd.	03313214
Allied Irish Banks PLC	Chhabra International, Ltd.	03313644
Allied Irish Banks PLC	Chhabra International, Ltd.	03313131
Allied Irish Banks PLC	Chhabra International, Ltd.	03313057
Allied Irish Banks PLC	Chhabra International, Ltd.	03313560
Allied Irish Banks PLC	Chhabra International, Ltd.	03313800
Allied Irish Banks PLC	Chhabra International, Ltd.	17397082
Allied Irish Banks PLC	Chhabra International, Ltd.	17396944
Allied Irish Banks PLC	Chhabra International, Ltd.	051890840
Allied Irish Banks PLC	Chhabra International, Ltd.	03313487
St. Kitts, Nevis and Anguilla National Bank	USA Prescription, Inc.	42099
Hong Kong and Shanghai Banking Corp.		51706547259
Hong Kong and Shanghai Banking Corp.		51706547261
India Overseas Bank		D001140345
State Bank of India		1392-025552
State Bank of India		139J-02555206
State Bank of India		139J-02555203
State Bank of India		139J-02555204
State Bank of India		139J-02555205
State Bank of India		139J-02555207
State Bank of India		139J-02555209
State Bank of India		139J-02555210
State Bank of India		1392-02555204



<i><b>Institution</b></i>	<i><b>Account Name</b></i>	<i><b>Account Number</b></i>
State Bank of India		1392-02555202
State Bank of India		1392-02555201
Union Bank of India		D911373491107
Discover	Medprescribe.com and any reserve account	601101307731636
Huntington National Bank	Naresh and Sushma Chhabra	03898660138

## **F. Other Personal Property**

- (1) All household furnishings, including electronics, located within 2449 Greenbriar Court, Weston, FL, and 547 Ocean Blvd., Golden Beach, FL;
- (2) \$5,082 seized at 2449 Greenbriar Court, Weston, FL;
- (3) \$19,964 seized at 547 Ocean Blvd., Golden Beach, FL;
- (4) \$3,100 in American Express Traveler's Checks seized at 2449 Greenbriar Court, Weston, FL;
- (5) \$7,616.55 in the trust account of Gillen Parker & Withers LLC in Atlanta, GA.

## **G. Real Property**

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, more particularly described as:

- (1) Real property located at 2477 Provence Circle, Weston, Florida 33327, legally known as  
lot 21, Sector 7-Parcels T, According to the Plat thereof, recorded in Plat Book 162, page 14 of the public records of Broward County, Florida; Instrument #101485152, OR BK 32379 PG 1311;
- (2) Real property located at 12809 Meadowbreeze Drive, Wellington, Florida 33414, legally known as  
lot 163 Meadowland Cove - Plat No. 1 of Wellington, P.U.D. according to the plat thereof recorded in Plat Book 58 pages 9 to 11 inclusive, of the public records of Palm Beach County, Florida;
- (3) Real property located at 2449 Greenbriar Court, Weston, Florida, legally known as



Lot 65 of Sector 7 - Parcel N-1, according to the plat thereof, as recorded in Plat Book 165, at page 24 of the public records of Broward County, Florida;

- (4) Real property located at 12103 Areaca Drive, Wellington, Florida, legally known as Pinewood East of Wellington Lot 32 Block 1;

- (5) Real property located at 10187 Windsor Way, Powell, Ohio, legally known as Lot 1475, Wedgewood Section 2 in Delaware County, Ohio;

- (6) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, more particularly described as real property located at 1485 Northpark Drive, Weston, Florida 33326, legally known as

A portion of Lot 2, Block 2, Park of Commerce, according to the plat thereof, as recorded in Plat Book 110, page 15 of the public records of Broward County, Florida, described as follows: Commencing at the Southwest Corner of said Lot 1, Block 2; thence North 14°22'18" East, a distance of 40.20 Feet; thence continue North 14°22'18" East, a distance of 405.80 Feet; thence North 39°00'00" East, a distance of 36.00 feet- the last two courses being coincident with the West boundary of said Lot 1, Block 2, of said Park of Commerce, to the point of beginning; thence continue North 39°00'00" East, a distance of 47.79 Feet; thence North 12°35'00" East, a distance of 239.67 Feet; thence South 82°44'50" East, a distance of 140.55 Feet; thence South 07°15'10" West, a distance of 38.00 Feet; thence South 82°44'50" East, a distance of 140.00 Feet; thence South 07°15'10" West, a distance of 75.47 feet; thence North 82°44'50" West, a distance of 115.00 Feet; thence South 07°15'10" West, a distance of 200.43 feet; thence North 83°39'39" West, a distance of 25.29 Feet; thence North 58°39'02" West, a distance of 32.54 Feet; thence North 83°21'46" West, a distance of 99.00 Feet; thence North 06°38'13" East, a distance of 6.93 feet; thence North 83°21'46" West, a distance of 31.29 Feet; thence North 51°00'00" West to the point of beginning. Said lands situate in Broward County, Florida, containing 62,673 square feet, or 1.44 Acres, more or less;

- (7) Real property located at 1455 North Park Drive, Weston, FL, legally known as

A portion of Lots 2 and 3, Block 2, Park of Commerce, according to the Plat thereof, as recorded in Plat Book 110, Page 15, of the public records of Broward County, Florida, being more particularly described as follows: Commencing at the Southwest corner of said Lot 2, Block 2; thence North 39°00'00" East, a distance of 83.00; thence North 12°35'00" East, a distance of 239.67 feet, the last two courses being coincident with the Westerly boundary of said Lot 2, to the



point of beginning; thence continue North 12°35'00" East, a distance of 9.33 feet, thence North 08°07'29" West, a distance of 138.26; thence South 77°48'01" East, a distance of 173.90 to the Point of Curvature of a curve concave to the Northeast; thence Southeasterly along the arc of said curve having a radius of 2,213.93 feet, a central angle of 03°42'33", an arc distance of 143.31 feet; thence South 07°15'10" West, a distance of 157.87 feet; thence North 82°44'50" West, a distance of 140.00 feet; thence North 07°15'10" East, a distance of 38.00 feet; thence North 82°44'50" West, a distance of 140.55 feet to the point of beginning. Plus rights and obligations under Easement Access and Maintenance Agreement dated November 30, 2000, recorded in OR Book 31099, Page 1769, as amended by First Amendment to Easement Access Maintenance Agreement dated March 27, 2002, recorded in OR Book 32963, Page 124, and Second Amendment to Easement Access Maintenance Agreement dated March 27, 2002, recorded in OR Book 32963, Page 135 of the public records of Broward County, Florida.

(8) Real property located at Lot 20, Block "D", Civic Industrial Area, Freeport, Bahamas, including the warehouse on said property.

#### **H. Web Sites**

All interest in and control over the following websites, including the registration of the domain names:

www.rxclinic.com;  
www.eprescribe.com;  
www.privacyrx.com;  
www.choicern.com;  
www.rxleader.com;  
www.medprescribe.com;  
www.clickprescribe.com;  
www.usaprescription.com;  
www.selectpharmacy.com;  
www.safewebmedical.com;  
www.medicineshelf.com;  
www.clickmeds.com;  
[www.metability.com](http://www.metability.com);

wherever registered. Property affiliated with forfeiture of the websites includes, but is not limited to, all computers and related electronic devices, contents, data, information, stored



electronic communications, code used to generate and process data and other files, in any format whether physical or electronic, including backups, printouts, and unpublished drafts, which comprise or are used in the preparation and presentation of the websites listed above, regardless of the geographic location of the aforementioned contents;

## **I. Other Personal Assets**

Any monies held on behalf of Vincent K. Chhabra, Sabina S. Faruqui, VKC Consulting, LLC, Chhabra Group, LLC, or USA Prescription, Inc., by the law firms of: Steel Hector & Davis; Richards, Polansky & Seuss; Ellsworth, Gonzalez & Roppolo, PA; Green, Kahn & Piotrkowski, PA; Schottenstein, Zox & Dunn; and Kravitz & Kravitz.

2. The Attorney General or the Secretary of the Treasury is authorized to seize the property and to conduct any discovery proper in identifying or locating the property subject to forfeiture, in accordance with Fed.R.Crim.P. 32.2(b)(3).

3. The United States shall publish notice of this order and of its intent to dispose of the property one time in such manner as the Attorney General may direct. The United States shall also, to the extent practicable, provide direct written notice to any persons known to have alleged an interest in the property.

4. Any person, other than the defendant, asserting any legal interest in the property may, within thirty days of the final publication of notice or his receipt of notice, whichever is earlier, petition the court pursuant to 21 U.S.C. § 853(n) for a hearing to adjudicate the validity of his alleged interest in the property.

5. Following the Court's disposition of all petitions filed, or if no such petitions are filed within the time prescribed by law, upon proof of publication and proof of notice to any persons



known to have alleged an interest in the property, the United States shall have clear title to the property and may warrant good title to any subsequent purchaser or transferee.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

LEONIE M. BRINKEMA  
UNITED STATES DISTRICT JUDGE

WE ASK FOR THIS:

---

Brian D. Miller  
Karen L. Taylor  
Assistant United States Attorneys

Eugene Thirolf, Director  
Office of Consumer Litigation  
U.S. Department of Justice

Sabina S. Faruqui  
Defendant

Denise Tassi  
Craig A. Gillen  
Counsel for the Defendant